



December 18, 2020

Natalie Mast, AMA Director - Management Plans
Arizona Department of Water Resources
1110 W. Washington St, Suite 310
Phoenix, Arizona, 85007

Re: 5th Management Plan for the Phoenix AMA, Non-Per Capita Conservation Program

Dear Ms. Mast:

The Arizona Municipal Water Users Association (AMWUA) appreciates the Arizona Department of Water Resources' (ADWR) approach to developing the 5th Management Plan through a public stakeholder forum and applauds ADWR's efforts to reduce withdrawals of groundwater through an assessment and update of our conservation programs.

AMWUA's members provide water service to over 3.5 million people in the Phoenix Active Management Area (AMA). Leveraging expertise of the staff who administer the water conservation programs of these municipal utilities, AMWUA has developed a proposal to assist ADWR in its efforts to continually improve upon the Non-Per Capita Conservation Program (NPCCP). AMWUA's proposal includes modifications to the framework of the NPCCP as well as the language of individual Best Management Practices (BMP).

We have reviewed and discussed this proposal with the AMWUA Board of Directors and AMWUA Management Board. This proposal represents the collective voice of the ten AMWUA cities and is intended to:

- Provide consistency and clarity to any descriptions of conservation programs and BMPs to better fit today's more advanced demand management programs.
- Expand reporting requirements to address the need for collecting consistent, quantitative data that measures the effectiveness of conservation practices.
- Maintain Arizona's national reputation of leadership in water conservation by elevating the choices and opportunities within the NPCCP in order to achieve meaningful water savings.

AMWUA appreciates the extensive effort ADWR has put forth to work with stakeholders through the 5th Management Plan process and trusts that ADWR will ultimately move forward in a way that advances our shared goal of increasing water conservation and efficiency within Arizona. AMWUA looks forward to continuing to partner with ADWR throughout the remainder of the stakeholder process. Please contact Sam Draper, AMWUA's Conservation and Efficiency Program Manager, at sdraper@amwua.org with any questions you may have on the comments included herein.

Sincerely,

Warren Tenney
Executive Director

Enclosures

Arizona Municipal Water Users Association



Overview of AMWUA's Enclosed Comments		
Section	Title	Description
Attachment A	Proposed Structure	Outline of AMWUA's proposed changes to the framework of the NPCCP. Includes recommendations on Tier structure, BMP Categories, and concepts for incentivizing water providers to exceed the minimum regulatory requirements
Attachment B	Overview and Explanation of Revisions for Appendix 5C	High level explanation and rationale for AMWUA's proposed amendments to the BMP text
Attachment C	Suggested Text Revisions for Appendix 5C	In-line recommendations and edits for the BMP language
Attachment D	Planning Category Comments	Feedback on BMPs located in the proposed "Planning Category"

Arizona Municipal Water Users Association

5th Management Plan Non-Per Capita Conservation Program: *Proposed Structure*

AMWUA leveraged expertise of its staff, its members' staffs who administer the water conservation programs of large municipal utilities, and AMWUA's Boards to develop a proposal to restructure the Non-Per Capita Conservation Program (NPCCP). This proposed restructuring of the NPCCP is supported by ten municipal water providers who have water conservation programs of differing degrees and scope. What unites them is the desire for the NPCCP to have an effective structure in place to encourage continuous improvement in water conservation.

When looking to the 5th Management Plan NPCCP, AMWUA sought to maintain the innovation that was instilled in the program's past iterations while refreshing it to the 2020 standards of the demand management industry.

Table 1: 4MP NPCCP Structure and AMWUA's 5MP NPCCP Proposed Structure

4MP Structure	5MP Proposed Structure
Section I. Basic Public Information Program	Section I. Public Engagement Program
Section II. Additional BMPs	I.A. Required Public Engagement Program I.B. Supplemental Public Engagement Components
1. Public Awareness/Public Relations	Section II. Best Management Practices
2. Conservation Education & Training	II.A. Outreach Services & Rebates/Incentives
3. Outreach Services	II.B. Physical System Evaluation & Improvement
4. Physical System Evaluation & Improvement	II.C. Sustainable Water Governance
5. Ordinances/Conditions of Service/Tariffs	II.D. Research & Innovation in Demand Management
6. Rebates/Incentives	
7. Research/Innovation Program	
Section III. Procedure for Adding a BMP	Section III. Procedure for Adding a BMP

Section I. Public Engagement Program

Section I. of our proposal is the Public Engagement Program. Through conversations with the professionals who have implemented these programs for decades, we identified the need to update the name of the Basic Public Information Program to the Public Engagement Program because these programs are not basic. Public engagement is vital; without communicating the importance of water conservation and providing educational resources on how to conserve, conservation programs cannot succeed.

To emphasize this, the Public Engagement Program has been expanded to two parts: a Required Public Engagement Program and Supplemental Public Engagement Components. All providers

regulated under the NPCCP would have to implement all practices listed under the Required Public Engagement Program. Depending on the provider's Tier, it would also have to implement additional Supplement Public Engagement Components.

Section II. Best Management Practices

Section II. of our proposed structure captures the remainder of the Best Management Practices (BMP). The BMPs are quantitative and focused on how to drive reductions in water consumption and/or increased water use efficiency. When we reworked the framework for this program we wanted to simplify, streamline, and expand options. Additionally, we wanted to expand the content of each BMP to further clarify its implementation and reporting requirements.

We reclassified the BMPs into four categories:

II.A. Outreach Services & Rebates/Incentives

This category has two parts: residential and non-residential. The residential and non-residential portions are exact mirrors of each other. It is critical to separate the two sectors for reporting purposes which will aid in ADWR's data collection efforts and will allow utilities to record and recognize their residential and non-residential programs individually.

Regardless of the customer type, outreach services and rebate incentives are designed to provide customers with consultations, audits, or retrofits as well as providing incentives for implementing a water conservation practice.

II.B. Physical System Evaluation & Improvement

This category is essentially the same as the 4th Management Plan's Category 4: Physical System Evaluation and Improvement. The BMPs within are designed to ensure that the water system is being well maintained and is running at optimal efficiency.

II.C. Sustainable Water Governance

Programs in this category are designed to reduce water use within a service area by regulating water used for specific purposes, e.g. ordinances and requirements.

We purposefully gave this category the boarder title of Sustainable Water Governance. We wanted to hold space for this category to be able to encompass new BMPs that may be introduced in future, like integrated water resource and water conservation planning.

II.D. Research & Innovation in Demand Management

The last category in our proposal is Research & Innovation in Demand Management. This category captures programs that encourage water providers to conduct research and analysis of both conservation measures currently in place and emerging technologies and

techniques. This category encourages forward-thinking exploration and evaluation which will be crucial for future policy development and decision-making.

Program Requirements

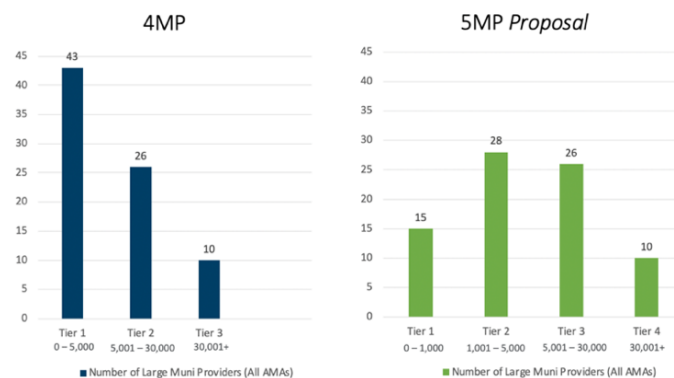
Tier Structure

Tiers are a crucial component of the NPCCP because they determine the amount of BMPs that a provider is required to implement. Under the 4th Management Plan, the tier structure groups the majority of water providers into Tier 1. AMWUA's tier structure is more granular and aims for a normal distribution which more evenly distributes providers amongst the tiers. Additionally, we strived to most appropriately group providers with similar sophistication levels.

Table 2: AMWUA Municipal NPCCP Tier Proposal

TIER	Total Number of Service Connections	
	4MP	5MP Proposal
Tier 1	0 – 5,000	0 – 1,000
Tier 2	5,001 – 30,000	1,001 – 5,000
Tier 3	30,001+	5,001 – 30,000
Tier 4	-	30,001 +

Chart 1: AMWUA Municipal NPCCP Tier Distribution



BMP Requirements by Tier

Consistent with ADWR's desired approach, AMWUA's proposal increases the amount of BMPs that must be implemented from the 4th Management Plan. AMWUA has also included the requirement that BMPs must come from two or more BMP categories to encourage diverse conservation programs.

AMWUA believes that the 5th Management Plan should require established quantities of BMPs rather than assigning points to the BMPs. Until there is a standard method or criteria for assigning point values, the assigned weighting will continue to be arbitrary. For the sake of simplicity and fairness, each BMP should be treated equally. The table below contains the proposed BMP requirements by tier:

Table 3: AMWUA BMP Requirements by Tier Proposal

SECTION I.		
TIER	4MP I. BASIC PUBLIC INFORMATION PROGRAM	5MP I. PUBLIC ENGAGEMENT PROGRAM <i>I.A. Required Public Engagement Program (5 parts) +</i>
Tier 1	Basic Public Information Program (2 parts)	-
Tier 2	Basic Public Information Program (2 parts)	1 Supplemental Public Engagement Component (I.B.)
Tier 3	Basic Public Information Program (2 parts)	2 Supplemental Public Engagement Components (I.B.)
Tier 4	-	3 Supplemental Public Engagement Components (I.B.)
SECTION II.		
TIER	4MP II. ADDITIONAL BEST MANAGEMENT PRACTICES	5MP II. BEST MANAGEMENT PRACTICES <i>(Must be from two or more BMP categories)</i>
Tier 1	3 BMPs	2 BMPs
Tier 2	8 BMPs	4 BMPs
Tier 3	15 BMPs	10 BMPs
Tier 4	-	15 BMPs

Beyond Compliance

AMWUA's proposal introduces a new concept: *Beyond Compliance*. This voluntary addition would reward innovation and dedication to water stewardship, which we believe is in line with ADWR's goals to reduce groundwater withdrawals through the Management Plans. This concept in particular is championed by our ten members as an effective and innovative way for the NPCCP to encourage continuous improvement in water conservation.

Importantly, the Beyond Compliance framework scales up to encourage cutting edge water conservation programs without penalizing water providers who struggle to meet the NPCCP requirements and are still in the initial stages of developing their demand management programs. It would also encourage providers to report on all BMPs they implement, not just the minimum necessary for compliance. This incentive would further ADWR's data collection efforts and provide the State with valuable information to showcase Arizona's water conservation programs.

Each Beyond Compliance class has increasingly stringent requirements, including expanding the number of categories that BMPs must originate from. There is no additional administrative work to implement the program for ADWR, only a review of the BMP reporting requirements consistent with the existing NPCCP process.

Table 4: AMWUA Beyond Compliance BMP Requirements by Tier Proposal

SECTION I. PUBLIC ENGAGEMENT PROGRAM			
TIER	Compliant <i>I.A. Required Public Engagement Program +</i>	Exceeds <i>I.A. Required Public Engagement Program +</i>	Exceptional <i>I.A. Required Public Engagement Program +</i>
Tier 1	-	1 Supplemental (<i>I.B.</i>)	2 Supplemental (<i>I.B.</i>)
Tier 2	1 Supplemental (<i>I.B.</i>)	2 Supplemental (<i>I.B.</i>)	3 Supplemental (<i>I.B.</i>)
Tier 3	2 Supplemental (<i>I.B.</i>)	3 Supplemental (<i>I.B.</i>)	4 Supplemental (<i>I.B.</i>)
Tier 4	3 Supplemental (<i>I.B.</i>)	4 Supplemental (<i>I.B.</i>)	5 Supplemental (<i>I.B.</i>)
SECTION II. BEST MANAGEMENT PRACTICES			
TIER	Compliant <i>BMPs must be from two or more categories</i>	Exceeds <i>BMPs must be from three or more categories</i>	Exceptional <i>BMPs must be from all four categories</i>
Tier 1	2 BMPs	4 BMPs	8 BMPs
Tier 2	4 BMPs	6 BMPs	10 BMPs
Tier 3	10 BMPs	14 BMPs	20 BMPs
Tier 4	15 BMPs	20 BMPs	25 BMPs

The Beyond Compliance concept is a regulatory best practice consistent with many other programs that seek to encourage better environmental outcomes without punitive measures. Within Arizona state government, similar successful programs exist – the Arizona Department of Environmental Quality Voluntary Environmental Stewardship Program (VESP) encourages organizations to go above and beyond environmental compliance, with five levels of recognition: Copper, Bronze, Silver, Gold, and Platinum. The Industrial Commission of Arizona administers the Voluntary Protection Program (VPP) which promotes exemplary worksite health and safety outcomes beyond the minimum requirements.

Beyond Compliance-like programs exist on a national scale as well. The Environmental Protection Agency, through its WaterSense partnership, extends annual recognition for organizations who implement exceptional water efficiency practices. The Alliance for Water Efficiency (AWE) maintains and verifies its voluntary “G480 Leaderboard” which recognizes the utilities across the nation that have adopted and complied with the American Water Works Association G480-13 Water Conservation Program Operation and Management Standard.

ADWR is not alone in facing the challenge of regulating a broad spectrum of entities who have different capacities for achieving compliance. AMWUA strongly encourages the Department to consider the Beyond Compliance framework, or something similar, as a mechanism that innovates on the current Management Plan structure and is supported by the proven success of similar programs.

5th Management Plan Non-Per Capita Conservation Program: *Overview and Explanation of Revisions for Appendix 5C*

The subsequent tables on pages 2-11 organize our explanations for each proposed text revision to Appendix 5C. In the left-hand column, you will find the reference number for the BMP as labeled in ADWR’s 5MP Concepts BMP document. In the right-hand column, you will find a reference to the specific category that the BMP would fall within AMWUA’s proposed 5th Management Plan NPCCP structure. An outline of AMWUA’s proposed NPCCP structure is also included below.

AMWUA’s proposed revisions to Appendix 5C of the draft 5th Management Plan are intended to:

- Provide consistency and clarity to any descriptions of conservation programs and BMPs to better fit today’s more advanced demand management programs.
- Expand reporting requirements to address the need for collecting consistent, quantitative data that measures the effectiveness of conservation practices.
- Maintain Arizona’s national reputation of leadership in water conservation by elevating the choices and opportunities within the NPCCP in order to achieve meaningful water savings.

Appendix 5C captures the practice and program descriptions as well as the implementation and reporting requirements. AMWUA and its members’ conservation staffs look forward to collaborating with ADWR in the future to provide empirical suggestions to enhance the Conservation Efforts Report (CER) Form.

AMWUA’s Proposed 5MP NPCCP Structure	
Section I. Public Engagement Program	
I.A. Required Public Engagement Program	
I.B. Supplemental Public Engagement Components	
Section II. Best Management Practices (BMP)	
II.A. Outreach Services & Rebates/Incentives	
Residential (notated as II.A. – R)	
Non-Residential (notated as II.A. – NR)	
II.B. Physical System Evaluation & Improvement	
II.C. Sustainable Water Governance	
II.D. Research & Innovation in Demand Management	
Section III. Procedure for Adding a BMP	

I. Public Engagement Program		
#	Overview & Explanation of AMWUA's Proposed Changes	AMWUA Proposal
1	<ul style="list-style-type: none"> Recommended expansion of implementation requirement to include communicating through the provider's website because this is an industry standard. Recommended a list of additional communication channels to assist providers in implementing this effort. Recommended reporting requirements that would allow ADWR to collect quantitative data about outreach efforts. 	I.A.
2	<ul style="list-style-type: none"> Recommended implementation requirement that a provider maintain a list of the written materials made available to customers for that reporting year be available to ADWR upon request rather than a submission requirement. Narrative responses should be limited in the CER Form because they cannot be aggregated into useable data. 	I.A.
3	<ul style="list-style-type: none"> Recommended implementation/reporting requirement that a provider maintain documentation that describes its conservation material distribution plan, to be made available to ADWR upon request. Narrative responses should be limited in the CER Form because they cannot be aggregated into useable data. 	I.A.

II. Best Management Practices (BMP)		
#	Overview & Explanation of AMWUA's Proposed Changes	AMWUA Proposal
1.1	Local or Regional Conservation Campaign <ul style="list-style-type: none"> Recommended moving this BMP to I.A. Required Public Engagement Program because of the high-level importance of participating in a local or regional conservation campaign. Recommended revising the reporting requirements to better address applicable and available data in real life implementation scenarios. Narrative responses should be limited in the CER Form because they cannot be aggregated into useable data. 	I.A.
1.2	Special Events, Programs and Community Presentations <ul style="list-style-type: none"> Recommended moving this BMP to I.A. Required Public Engagement Program because of the high-level importance of direct engagement with the public to provide education resources about water. Recommended removal of narrative response portion of the reporting requirement. 	I.A.

1.3	Adult Education and/or Training <i>Suggested title: Residential Adult Education and/or Training Program</i> <i>Suggested title: Non-residential Adult Education and/or Training Program</i> <ul style="list-style-type: none"> Recommended updating this BMP to separate residential and non-residential adult education and training programs. It is important to divide this BMP to reflect the growing emphasis on training non-residential adults, e.g., professionals in and/or related to the landscape and irrigation industry. These professionals, including HOA board members, property managers, landscapers, and business owners are all responsible for multiple end uses of water. Offering education and/or training programs for this targeted audience will increase their ability to make informed decisions which will yield increased water efficiencies at a larger aggregate level. 	I.B.
1.4	Youth Education Program —no suggested text change	I.B.
1.5	Xeriscape Demonstration Garden <ul style="list-style-type: none"> Recommended a list of criteria to add specificity to what constitutes a xeriscape demonstration garden. Recommended removal of narrative reporting requirement and inclusion of quantitative reporting requirements. 	I.B.
1.6	Industry and/or Regional Partnerships <ul style="list-style-type: none"> Recommended update to the reporting requirement to include noting the partnership's name, a link to the partnership's members webpage, and if the provider contributed financial support or in-kind services to the partnership. Recommended update to make the narrative description of the accomplishments of the partnership available to ADWR upon request rather a reporting requirement in the CER Form. 	I.B.
2.1	New Homeowner Outreach <ul style="list-style-type: none"> Recommended moving this BMP to I.A. Required Public Engagement Program because of the high-level importance of communicating low-water-use landscaping information to new homeowners and making connections as soon a customer moves into a service area. Outdoor water use has a great potential for water savings, and it is important to inform customers as soon as they move into their new house, especially if they are moving from a greener climate to Arizona. Recommended update to the reporting requirement to include noting the number of newly constructed homes and existing homes that were notified rather than quantifying the individual pieces of contact, e.g., phone calls, emails, etc. in an effort to capture more useful data. 	I.A.

2.2	Residential Audit & Landscape Consultation Program <ul style="list-style-type: none"> Recommended standard implementation requirements and reporting requirements that would allow ADWR to collect quantitative data about residential audit and/or landscape consultation program efforts in order to better assess the effectiveness of the BMP. 	II.A. – R
2.3	Non-Residential Audit & Landscape Consultation Program <ul style="list-style-type: none"> Recommended standard implementation requirements and reporting requirements that would allow ADWR to collect quantitative data about non-residential audit and/or landscape consultation program efforts in order to better assess the effectiveness of the BMP. 	II.A. – NR
2.4	Residential Water Budget <ul style="list-style-type: none"> Recommended standard implementation requirements to ensure consentient administration, ultimately resulting in better data collection and analysis. Recommended potential implementation requirement that the methodology for creating residential water budgets must be made available upon request. 	II.A. – R
2.5	Non-Residential Water Budget <ul style="list-style-type: none"> Recommended standard implementation requirements to ensure consentient administration, ultimately resulting in better data collection and analysis. Recommended potential implementation requirement that the methodology for creating residential water budgets must be made available upon request. 	II.A. – NR
2.6	Customer High Water Use Inquiry Resolution <ul style="list-style-type: none"> Recommended implementation requirement be updated from “must follow up on every customer inquiry” to “must provide follow up as needed” to more accurately reflect feasibility, as customer inquiries may necessitate being transferred out of the water conservation department and into another department where tracking may not be consistent. 	II.A.
2.7	Customer High Water Use Notification —no suggested text change	II.A.
3.1	Distribution System Leak Detection Program <ul style="list-style-type: none"> Recommended adding specific reporting requirements to quantify distribution system leak detection program findings. 	II.B.

	<ul style="list-style-type: none"> Recommended update to make the narrative description of the program available to ADWR upon request rather a reporting requirement in the CER Form. 	
3.2	Meter Repair or Replacement Program —no suggested change	II.B.
3.3	Advanced Metering Infrastructure (AMI) Installation <ul style="list-style-type: none"> Recommended removal of the word “monitors” from the BMP description in an effort to avoid overlap with BMP 3.4. 	II.B.
3.4	Advanced Metering Infrastructure (AMI) Maintenance <ul style="list-style-type: none"> Recommended update to make the narrative description of the program available to ADWR upon request rather a reporting requirement in the CER Form. 	II.B.
3.5	Approved Comprehensive Water System Audit Program <ul style="list-style-type: none"> Recommended adding language regarding the use of the American Water Works Association M36 Manual to the BMP description. Recommended update to the reporting requirement to capture quantitative results and to provide narrative responses to ADWR upon request, rather than a require CER Form submission. 	II.B.
4.1	Low-Water-Use Landscaping Requirements <ul style="list-style-type: none"> Recommended reporting requirement that a provider must include with its CER, the ordinance number and a weblink to the language in the municipal code Recommended reporting requirement that a provider must note in its CER if the ordinance is new, was updated, or remained unchanged for the reporting year. Recommended removal of reporting requirement to include a description of enforcement and/or follow-up activities related to the requirement. It may be more beneficial to simply have record of the type of requirement, e.g., compliance, enforcement, both. <ul style="list-style-type: none"> Low water use landscaping ordinances would be compliance, because plans are reviewed before installation. They may also be enforceable, if the utility physically checks the site after installation. Water waste investigations would be likely be all enforcement. Recommended removal of narrative response portions of the reporting requirement. 	II.C.

4.2	Water Tampering and/or Water Waste Prohibition <ul style="list-style-type: none"> Recommended reporting requirement that a provider must include with its CER, the ordinance number and a weblink to the language in the municipal code Recommended reporting requirement that a provider must note in its CER if the ordinance is new, was updated, or remained unchanged for the reporting year. Recommended removal of reporting requirement to include a description of enforcement and/or follow-up activities related to the requirement. It may be more beneficial to simply have record of the type of requirement, e.g., compliance, enforcement, both. Recommended removal of narrative response portions of the reporting requirement. 	II.C.
4.3	Plumbing Requirements Stricter than Current Arizona Code <ul style="list-style-type: none"> This BMP as currently written would award a point to every water provider in Arizona because the Arizona plumbing code is superseded by federal standards. If the idea of the BMP program is to value demand management practices that go above the bare minimum, this optional BMP should adjust its plumbing efficiency target from the Arizona code to the EPA WaterSense Program standards. Recommended reporting requirement that a provider must include with its CER, the ordinance number and a weblink to the language in the municipal code Recommended reporting requirement that a provider must note in its CER if the ordinance is new, was updated, or remained unchanged for the reporting year. Recommended removal of reporting requirement to include a description of enforcement and/or follow-up activities related to the requirement. It may be more beneficial to simply have record of the type of requirement, e.g., compliance, enforcement, both. Recommended removal of narrative response portions of the reporting requirement. 	II.C.
4.4	Water Feature Limitations <ul style="list-style-type: none"> Recommended reporting requirement that a provider must include with its CER, the ordinance number and a weblink to the language in the municipal code 	II.C.

	<ul style="list-style-type: none"> Recommended reporting requirement that a provider must note in its CER if the ordinance is new, was updated, or remained unchanged for the reporting year. Recommended removal of reporting requirement to include a description of enforcement and/or follow-up activities related to the requirement. It may be more beneficial to simply have record of the type of requirement, e.g., compliance, enforcement, both. Recommended removal of narrative response portions of the reporting requirement. 	
4.5	Water-Efficient Model Home Landscape Requirements <ul style="list-style-type: none"> Recommended reporting requirement that a provider must include with its CER, the ordinance number and a weblink to the language in the municipal code Recommended reporting requirement that a provider must note in its CER if the ordinance is new, was updated, or remained unchanged for the reporting year. Recommended removal of reporting requirement to include a description of enforcement and/or follow-up activities related to the requirement. It may be more beneficial to simply have record of the type of requirement, e.g., compliance, enforcement, both. Recommended removal of narrative response portions of the reporting requirement.	II.C.
4.6	Graywater or Rainwater System Requirements <ul style="list-style-type: none"> Recommended reporting requirement that a provider must include with its CER, the ordinance number and a weblink to the language in the municipal code Recommended reporting requirement that a provider must note in its CER if the ordinance is new, was updated, or remained unchanged for the reporting year. Recommended removal of reporting requirement to include a description of enforcement and/or follow-up activities related to the requirement. It may be more beneficial to simply have record of the type of requirement, e.g., compliance, enforcement, both. Recommended removal of narrative response portions of the reporting requirement. 	II.C.
4.7	Water Intensive Commercial User Requirements <ul style="list-style-type: none"> Recommended reporting requirement that a provider must include with its CER, the ordinance number and a weblink to the language in the municipal code 	II.C.

	<ul style="list-style-type: none"> • Recommended reporting requirement that a provider must note in its CER if the ordinance is new, was updated, or remained unchanged for the reporting year. • Recommended removal of reporting requirement to include a description of enforcement and/or follow-up activities related to the requirement. It may be more beneficial to simply have record of the type of requirement, e.g., compliance, enforcement, both. • Recommended removal of narrative response portions of the reporting requirement. 	
4.8	<p>Landscape Watering Restrictions</p> <ul style="list-style-type: none"> • Recommended specificity be added to this BMP's description to include landscape watering restrictions during specific days of the week, surrounding weather events, during particular seasons, etc. • Recommended reporting requirement that a provider must include with its CER, the ordinance number and a weblink to the language in the municipal code • Recommended reporting requirement that a provider must note in its CER if the ordinance is new, was updated, or remained unchanged for the reporting year. • Recommended removal of reporting requirement to include a description of enforcement and/or follow-up activities related to the requirement. It may be more beneficial to simply have record of the type of requirement, e.g., compliance, enforcement, both. • Recommended removal of narrative response portions of the reporting requirement. 	II.C.
4.9	<p>Water-Efficient Hot Water Device or System Requirements</p> <ul style="list-style-type: none"> • Recommended reporting requirement that a provider must include with its CER, the ordinance number and a weblink to the language in the municipal code • Recommended reporting requirement that a provider must note in its CER if the ordinance is new, was updated, or remained unchanged for the reporting year. • Recommended removal of reporting requirement to include a description of enforcement and/or follow-up activities related to the requirement. It may be more beneficial to simply have record of the type of requirement, e.g., compliance, enforcement, both. • Recommended removal of narrative response portions of the reporting requirement. 	II.C.

4.10	Retrofit on Resale <ul style="list-style-type: none"> Recommended reporting requirement that a provider must include with its CER, the ordinance number and a weblink to the language in the municipal code Recommended reporting requirement that a provider must note in its CER if the ordinance is new, was updated, or remained unchanged for the reporting year. Recommended removal of reporting requirement to include a description of enforcement and/or follow-up activities related to the requirement. It may be more beneficial to simply have record of the type of requirement, e.g., compliance, enforcement, both. Recommended removal of narrative response portions of the reporting requirement. 	II.C.
4.11	Non-Residential Landscape Water-Use Efficiency Standards <ul style="list-style-type: none"> Recommended reporting requirement that a provider must include with its CER, the ordinance number and a weblink to the language in the municipal code Recommended reporting requirement that a provider must note in its CER if the ordinance is new, was updated, or remained unchanged for the reporting year. Recommended removal of reporting requirement to include a description of enforcement and/or follow-up activities related to the requirement. It may be more beneficial to simply have record of the type of requirement, e.g., compliance, enforcement, both. Recommended removal of narrative response portions of the reporting requirement. 	II.C.
4.13	Conservation Rate Structure <ul style="list-style-type: none"> Recommended reporting requirement that a provider must include with its CER, a copy of the rate structure and indicate if the rate structure is new, was updated, or remained unchanged for the reporting year. Recommended removal of reporting requirement to include a description of enforcement and/or follow-up activities related to the requirement because it is not applicable to this requirement Recommended removal of narrative response portions of the reporting requirement. 	II.C.

4.14	Enforcement or Audit of Requirements—<i>Recommended Removal</i> <ul style="list-style-type: none"> Recommended removal of this BMP. Enforcing your requirement should be a component of the requirement itself, not an extra point. 	n/a
5.1	Residential Customer Assistance—no suggested change	II.A. – R
5.2	Residential Toilet Incentive—no suggested change	II.A. – R
5.3	Residential Smart Irrigation Technology Incentive <ul style="list-style-type: none"> Recommended BMP description be updated to include the requirement of being at least as efficient at the EPA WaterSense Program standards to provide an element of third-party evaluation. Recommended additional reporting requirement that if the smart irrigation technology that is incentivized under this BMP is not EPA WaterSense labeled, then a description of the technology’s benefits must be included in the CER. 	II.A. – R
5.4	Residential Water-Efficient Appliance Incentive <ul style="list-style-type: none"> Recommended BMP description be updated to include the requirement of being at least as efficient at the EPA WaterSense and/or EnergyStar Program standards to provide an element of third-party evaluation. Some appliances are not currently rated under the WaterSense program but do have a rating under the EnergyStar program. While EnergyStar focuses on energy performance, they also consider water savings and may be valuable for the water/energy nexus. An energy-efficient device that does not use water may still directly result in water savings. 	II.A. – R
5.5	Residential Graywater Incentive—no suggested change	II.A. – R
5.6	Residential Rainwater Harvesting Incentive—no suggested change	II.A. – R
5.7	Residential Landscape Conversion Incentive—no suggested change	II.A. – R
5.8	Residential Xeriscape in New Landscapes Incentive <i>Suggested title: Residential Xeriscape Installation in New Landscapes Incentive</i> <ul style="list-style-type: none"> Recommended additional language to BMP description to clarify this incentive is targeted towards xeriscape installations in new construction homes. 	II.A. – R
6.1	Non-Residential Customer Assistance—<i>Recommended Removal</i> <ul style="list-style-type: none"> Recommended removal of this duplicative BMP. The intent of the next BMP (6.2) is to offer a customizable program for each water provider. Many water providers across the country administer open-ended commercial rebates as each commercial site has unique water demands. 6.1 is vague and attempts to reach a similar intent, 	n/a

	potentially resulting in providers reporting the same effort under two BMPs.	
6.2	Commercial and Industrial Customer Incentive <ul style="list-style-type: none"> Recommended removal of the language, “the highest,” from the BMP description. Water providers offer commercial and industrial customer incentives to all non-residential customers, not just the highest users. Any water conservation efforts help achieve the goal of reducing groundwater withdrawals. 	II.A. – NR
6.3	Non-Residential Toilet and/or Urinal Incentive —no suggested change	II.A. – NR
6.4	Non-Residential Smart Irrigation Technology Incentive <ul style="list-style-type: none"> Recommended BMP description be updated to include the requirement of being at least as efficient at the EPA WaterSense Program standards to provide an element of third-party evaluation. Recommended additional reporting requirement that if the smart irrigation technology that is incentivized through this BMP is not EPA WaterSense labeled, then a description of the technology’s benefits must be included in the CER. 	II.A. – NR
6.5	Non-Residential Water-Efficient Appliance Incentive <ul style="list-style-type: none"> Recommended BMP description be updated to include the requirement of being at least as efficient at the EPA WaterSense and/or EnergyStar Program standards to provide an element of third-party evaluation. Some appliances are not currently rated under the WaterSense program but do have a rating under the EnergyStar program. While EnergyStar focuses on energy performance, they also consider water savings and may be valuable for the water/energy nexus. An energy-efficient device that does not use water may still directly result in water savings. 	II.A. – NR
6.6	Non-Residential Graywater Incentive —no suggested change	II.A. – NR
6.7	Non-Residential Rainwater Harvesting Incentive —no suggested change	II.A. – NR
6.8	Non-Residential Landscape Conversion Incentive —no suggested change	II.A. – NR
6.9	Non-Residential Xeriscape in New Landscapes Incentive <i>Suggested title: Non-Residential Xeriscape Installation in New Landscapes Incentive</i> <ul style="list-style-type: none"> Recommended additional language to BMP description to clarify that this incentive is targeted towards xeriscape installations in new non-residential, construction. 	II.A. – NR

6.10	Non-Residential Large Landscape Incentive—<i>Recommended Removal</i> <ul style="list-style-type: none"> Recommended removal of this duplicative BMP. It is vague and seems to be a culmination of the intent of BMPs 2.5, 6.2, 6.4, and 6.8, potentially resulting in providers reporting the same effort under two BMPs. 	n/a
7.1 – 7.8	Category 7: Planning <ul style="list-style-type: none"> <i>Please see Attachment D: Planning Category Comments for AMWUA’s feedback on this proposed section.</i> 	
8.1	Market Surveys and/or Focus Groups <ul style="list-style-type: none"> Recommended additional language to BMP description to clarify that this practice must be performed by a professional to elevate the integrity of the BMP and to add specificity that the survey and/or focus group must be designed to gather data on the <i>effectiveness</i> of the conservation messages or programs. Recommended implementation requirement that documentation and analysis on the market survey and/or focus group must be made available for public distribution. 	II.D.
8.2	Research of a New Technology and/or Technique—no suggested change	II.D.
8.3	Pilot Plan Development for a New Technology and/or Technique—no suggested change	II.D.
8.4	Piloting a New Technology and/or Technique—no suggested change	II.D.
8.5	Evaluation of a New or Emerging Technology and/or Technique—no suggested change	II.D.
8.6	Analyzing a Best Management Practice (BMP) for Actual Water Savings <i>Suggested Title: Third-Party Evaluation of an Existing Best Management Practice (BMP) or New or Emerging Technology or Practice for Actual Water Savings</i> <ul style="list-style-type: none"> Recommended expansion of this BMP to capture analyzing BMPs or new or emerging technologies or practices for actual water savings. A water provider should be evaluating the BMPs it implements as part of the BMP and its corresponding reporting requirement(s). Recommended adding specificity to the BMP description to focus on third-party evaluations of a BMP or new or emerging technology or practice to elevate the integrity of this practice. The inclusion of a third-party evaluation, such as one done by a university, could be utilized to help bring new meaning or connection to actual water savings as well as consider factors that a water provider may not normally consider or have the access or ability to do so. 	II.D.

DRAFT 5th Management Plans Municipal NPCCP BMP List**APPENDIX 5C
NON-PER CAPITA CONSERVATION PROGRAM
BEST MANAGEMENT PRACTICES**

The Non-Per Capita Conservation Program (NPCCP) is a conservation program for large water providers. Large undesignated providers shall be regulated under the NPCCP and shall submit a provider profile to ADWR by July 1, 2022. Large designated providers may elect to be regulated under the NPCCP by submitting a provider profile. See 5-605 for more information.

A large municipal water provider regulated under the NPCCP must implement a basic public information program plus three or more required water conservation best management practices, depending on the provider's tier. A best management practice (BMP) is a measure that results in reduced water consumption or increased water use efficiency. The number of BMPs a water provider must implement is based on the provider's tier which is determined by the provider's size as defined by its total number of water service connections. All providers regulated under the NPCCP must implement a ~~Basic Public Information Program~~Public Engagement Program (Section I) and select their additional required BMPs from Section II below.

At any time while regulated under the NPCCP, a provider may choose to discontinue implementation of a selected BMP (other than the required ~~Basic Public Information Program~~Public Engagement Program) and implement a substitute BMP instead. The substitute BMP must be on the list of approved BMPs in Section II of this appendix, and the provider must determine that the substitute BMP is reasonably relevant to its existing service area characteristics or water use patterns. A provider that substitutes a BMP must notify the Director of the substitution in its next Conservation Efforts Report (CER).

The Director may modify the list to include additional BMPs pursuant to the procedure set forth in Section III of this appendix. A copy of the most recent list of additional BMPs shall be posted on the ADWR's website and shall be on file with ADWR.

I. Public ~~Engagement~~education Program (Required of all providers)



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All large municipal providers regulated under the NPCCP are required to implement a ~~basic public information program~~Public Education Program that includes the following components:

1. At least four times a year, the water provider shall communicate to customers the importance of water conservation and notify them of the water conservation materials and programs available from the provider and how they may obtain the materials or more information. Customer communication channels shall include the provider's website and two or more of the following: water bills, paper newsletters, e-newsletters, group email blasts, Facebook, Twitter, Instagram, Nextdoor, postcards, print newspapers, or other print pieces or other digital mediums.

Reporting Requirement: The water provider must report in its CER whether each listed channel was utilized (yes/no), and how frequently each communication channel was utilized (drop down choices)

2. The water provider shall make available to customers free written information on water conservation (e.g., pamphlets, brochures, fact sheets, etc.). The information shall be available in the provider's office, sent to customers on request or provided online for customers who prefer this method. The provider is encouraged to distribute water conservation information at other locations (e.g., libraries, chamber of commerce, town hall, etc.) and on their websites.

The provider shall maintain a list of the free written information on water conservation that it made available to customers during the reporting year. This documentation shall be made available to ADWR upon request.

3. The provider shall develop and implement a distribution plan to effectively deliver its water conservation materials and programs. The provider ~~shall maintain must-submit~~ documentation ~~with its CER~~ that describes the following and shall be made available to ADWR upon request:

- the goals and objectives for the distribution of materials;
- a description of the conservation materials to be distributed;
- how the materials will be distributed (libraries, landscape architects, nurseries, realtors, master gardeners, etc.);
- how the materials or programs will be marketed (post cards, water bill inserts, messages on water bills, on-hold phone messages, e-mail messages, public events, workshops, provider website, newsletters, local publications, etc.);
- a timetable for distribution; and
- a mechanism for tracking the distribution of materials.



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II. Additional Best Management Practices (BMPs)

Tier	Service Connections	Required number of BMP points/year
1	0 – 1,000	3 (must be from 2 or more categories)
2	1,001 – 5,000	5 (must be from 3 or more categories)
3	5,001 – 30,000	10 (must be from 4 or more categories)
4	30,001 +	20 (must be from 5 or more categories)

Category 1: Education and Public Awareness

BMPs in this category are designed to raise awareness of the need for water conservation or to educate and/or train a specific audience on water conservation practices.

Point(s) Value	Description	Implementation and Reporting Requirements
1.1 Local or Regional Conservation Campaign		
1 point	The water provider actively participates in an advertising or social marketing campaign to raise awareness of the need for water conservation and to encourage the efficient use of water. The campaign must reach local or regional customers using methods such as traditional media (television, radio or print), websites, social media, and promotional materials (e.g., brochures, vehicle wraps, bookmarks, magnets, etc.).	To receive credit for this measure providers must submit documentation with their CER that describes the campaign, the methods of advertising media utilized, how many customers it reached, and the results states the name of the campaign, a brief description, and the amount of money contributed or in-kind services offered. <u>The provider shall maintain record of the campaign's methods of advertising media utilized and marketing analytics that measure reach. This documentation shall be made available to ADWR upon request.</u>
1.2 Special Events, Programs, and Community Presentations		
1 point	The water provider provides speakers, conducts tours for the public, or participates in community	To receive credit for this measure providers must record how many events they participated in <u>and</u> , how many



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events to display, provide or present information about water conservation, and informs the public about the programs and resources.

people attended each event, ~~and a description of each event~~ in their CER.

1.3 Adult Education and/or Training

1 point

The water provider implements an education and/or training program for residential adults within the provider's service area that includes active personal participation. ~~An e~~Examples ~~is~~include regularly scheduled workshops and/or education programs for homeowners ~~or trainings and/or education programs for landscape professionals or non-residential water users.~~

To receive credit for this measure providers must state in their CER, the number and type of trainings and/or education programs held and the number of attendees per training and/or education program.

1.4 Youth Education

1 point

The water provider works with schools in its service area to provide or support programming that increases students' understanding of water resources and promotes water conservation. Examples of youth education programs include teacher trainings, classroom presentations, educational materials, assembly programs, water festivals, and guided field trips.

To receive credit for this measure providers must state in their CER the number and type of education programs and the number of participants per education program.

1.5 Xeriscape Demonstration Garden

1 point

The water provider installs and maintains a low-water-use or water-efficient demonstration garden. The garden must meet all of the following criteria:

- Be available to the public
- ~~and~~ Include interpretive signage and/or literature about low- water-use plants and/or water-efficient landscape practices.
- Maintain natural pruning

To receive credit for this measure, a provider must verifystate in its CER that its xeriscape demonstration garden meets all required criteria and state the location of the garden and its approximate size.~~a description of the demonstration garden and the interpretive signage and/or literature available at the garden.~~



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- practices, within safety
constrains
- Utilize efficient irrigation and/or
use passive rainwater harvesting

1.6 Industry and/or Regional Partnerships

**21
points**

The provider contributes financial support or in-kind services and actively participates in an industry or regional partnership that implements a collaborative program designed to increase water use efficiency or reduce water consumption.

The provider must name
describe the partnership and
include a link to the
partnership's members
webpage and whether the
provider contributed financial
support or in-kind services in its
CER. The provider shall
maintain a record of the
accomplishments of the
partnership. This documentation
shall be made available to
ADWR upon request., program-
objectives, ongoing and future-
efforts, and submit the-
information in its CER.

Category 2: Targeted Outreach and Consultation

BMPs in this category are designed to develop a relationship between customers and their water providers. These BMPs should increase a provider's involvement with its customers through outreach and/or consultation related to water conservation.

**Point(s)
Value**

Description

**Implementation and Reporting
Requirements**

2.1 New Homeowner Outreach

1 point

The provider provides low-water-use landscape information to all owners of newly constructed homes and existing homes (resale), either when the new homeowner calls to set up their service or through a phone call or email initiated by the provider. If the new homeowner requests physical copies of the information the provider shall distribute the material through mail, email, or delivery.

The number of newly constructed
homes and existing homes that were
notified of low-water-use landscape
materials must be recorded in the
provider's CER. phone calls,
emails, mailings, and deliveries-
regarding low water use landscape-
information must be recorded and-
noted in the provider's CER.



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2.2 Residential Audit and Landscape Consultation

1 point

The water provider offers an audit and/or landscape consultation program to all residential customers within the provider's service area. The audit and/or landscape consultation may include indoor components, outdoor components, or both. can be guided over the phone or conducted in-person by the provider or designated representative. The audit and/or landscape consultation may be performed by the provider or designated representative via phone call, e-mail, video chat, or in-person.

A residential audit and/or landscape consultation must include at least three of the following:

- include indoor water use components (e.g., toilets, faucets, showerheads, etc.)
- Outdoor water use components (e.g., hose bibs, irrigation system, pool/spa, water feature, plant selection, turf conversion options, etc.), or both.
- Leak check and detection assistance at the water meter
- Review with the resident their overall water consumption patterns for the home

~~Audits and/or landscape consultations conducted by the provider may include a meter check and written material about how to read the meter and use it to determine if there is a leak. The individual providing the audit and/or~~

The CER must include:

- The total number of audits and/or landscape consultations
- The number of each type of audit (indoor, outdoor, or both)
- How each audit and/or landscape consultation was performed (phone call, email, video chat, or in-person)
- Which three components were included in the audit and/or landscape consultation (indoor outdoor, leak check, an/or review of water consumption), if available
- ~~provided must be recorded and noted in the provider's CER. Additionally, a~~Actual water savings one year pre- and post-audit and/or landscape consultation, ~~if available must be recorded in the provider's CER. If unavailable, estimated water savings can be substituted for actual savings, but must be noted as estimated in the provider's CER.~~



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~~landscape consultation shall provide either on-site written or verbal suggestions and provide a follow-up visit or interview.~~

2.3 Non-Residential Audit and Landscape Consultation

1 point

The water provider offers an audit and/or landscape consultation program to all non-residential customers within the provider's service area. ~~The audit and/or landscape consultation can be guided over the phone or conducted in-person by the provider or designated representative.~~ The audit and/or landscape consultation may include indoor components (e.g., toilets, faucets, showerheads, etc.), outdoor components (e.g., irrigation system, pool, plant selection, etc.), or both. The audit and/or landscape consultation may be performed by the provider or designated representative via phone, call, e-mail, video chat, or in-person.

A non-residential audit and/or landscape consultation must include at least three of the following:

- Indoor water use (e.g., toilets, faucets, showerheads, etc.)
- Outdoor water use (e.g., hose bibs, irrigation system, pool/spa, water feature, plant selection, turf conversion options, etc.)
- Leak check and detection assistance at the water meter
- Review with the non-resident staff or contractor their overall water consumption patterns

~~Audits and/or landscape consultations conducted by the provider may include a meter check and written material about how to read the meter and use it to determine if there is a leak. The individual providing the audit and/or landscape consultation shall provide~~

The CER must include:

- The total number of audits and/or landscape consultations
- The number of each type of audit (indoor, outdoor, or both)
- How each audit and/or landscape consultation was performed (phone call, email, video chat, or in-person)
- Which three components were included in the audit and/or landscape consultation (indoor outdoor, leak check, an/or review of water consumption), if available
- Actual water savings one year pre- and post-audit and/or landscape consultation, if available. ~~The number of audits and/or landscape consultations provided must be recorded and noted in the provider's CER. Additionally, actual water savings one year pre- and post-audit and/or landscape consultation must be recorded in the provider's CER. If unavailable, estimated water savings can be substituted for actual savings, but must be noted as estimated in the provider's CER.~~



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~~either on-site written or verbal suggestions and provide a follow-up visit or interview.~~

2.4 Residential Water Budget

1 point

The water provider offers a water budgeting program~~assistance in developing a monthly or annual water budget~~ to ~~one or more~~ residential customers within the provider's service area. The water budget shall establish target amounts for outdoor water use and may include indoor water use ~~that reflect efficient water use/application rates~~. These ~~targets~~rates should meet or exceed water-use efficiencies required for similar uses as described in the Fifth Management Plan. If they are not addressed in the plan, water-use rates should be commensurate with state-of-the-art water efficiency standards found elsewhere in the body of water conservation literature. Water budgets must be

The number of budgets provided and whether they included indoor, outdoor, or both components must be recorded and noted in the provider's CER. The methodology for creating budgets must be made available upon request.



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broken down by month and be
delivered either in print, through an
online portal, or by email.



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2.5 Non-Residential Water Budget

1 point

The water provider offers a water budgeting program ~~assistance in developing a monthly or annual water budget~~ to one or more non-residential water-using groups (e.g., homeowner associations, industries, commercial properties, government facilities, parks, schools, etc.) or to apartment complexes within the provider's service area. The water budget shall establish target amounts for outdoor water use and may include indoor water use ~~that reflect efficient water use/application rates~~. These ~~targets~~rates should meet or exceed water-use efficiencies required for similar uses as described in the Fifth Management Plan. If they are not addressed in the plan, water-use ~~targets~~rates should be commensurate with state-of-the-art water efficiency standards found elsewhere in the body of water conservation literature. Water budgets must be broken down by month and be delivered either in print, through an online portal, or by email.

The number of individual budgets provided and whether they included indoor, outdoor, or both components must be recorded and noted in the provider's CER. The number of non-residential water-using groups that received budgets must also be recorded, if available. The methodology for creating budgets must be made available upon request.

2.6 Customer High Water-Use Inquiry Resolution

1 point

The water provider designs and implements a program to assist customers who inquire about water bills ~~s~~ increases or high-water usage. The program may include a site inspection to discover the cause of a water bill increase and a meter check to inform the customer on how to read the meter and check for leaks.

The provider must follow up as needed ~~on every customer inquiry~~ and record the number of customers assisted and ~~the type of assistance provided and~~ report this information in its CER.

2.7 Customer High Water-Use Notification



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1 point

The water provider develops a program to identify customers with high water usage and contacts them by telephone, email, door hanger, mail, text, or in-person.

The notification must include information on provider services that could benefit the customer, such as audits, educational materials, or rebate programs. The number of notifications sent must be recorded and noted in the provider's CER.



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Category 3: Physical System Evaluation and Improvement

BMPs in this category are designed to reduce water loss by evaluating water distribution systems for leaks and/or malfunctioning equipment and implementing plans to correct the issues.

Point(s) Value	Description	Implementation and Reporting Requirements
3.1 Distribution System Leak Detection and Mitigation		
21 points	The water provider implements a systematic evaluation of its water distribution system to identify and fix leaks. The provider must implement this program throughout its service area unless the provider can demonstrate that targeting certain portions of its service area is likely to yield the highest water savings.	<p><u>The provider must report in its CER:</u></p> <ul style="list-style-type: none"> <u>The number of leaks identified</u> <u>The number of leaks repaired</u> <u>Miles of distribution system surveyed</u> <p>A description of the <u>distribution system leak detection and mitigation</u> program <u>that the provider followed must be made available to ADWR upon request. and its results must be noted in the provider's CER.</u></p>
3.2 Meter Repair or Replacement		
12 points	The water provider implements a program to systematically assess the meters or submeters in its service area to identify malfunctioning meters and to repair or replace them.	A description of the program including the replacement cycle of meters and the number of meters repaired or replaced each year must be noted in the provider's CER.
3.3 Advanced Metering Infrastructure (AMI) Installation		
12 points	The provider or designated representative plans <u>and, -</u> installs, and monitors advanced metering infrastructure (AMI) throughout its service area. Providers may also retrofit automatic meter reading (AMR) to AMI.	The number of units installed and/or retrofitted per year must be reported in the provider's CER. The water provider can receive credit for this measure a maximum of 5 years or until the AMI system is fully installed, whichever is less.
3.4 Advanced Metering Infrastructure (AMI) Maintenance and Utilization		



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12 points

The water provider or designated representative maintains the physical AMI system and related software. The water provider shall utilize the AMI data to provide services such as high-water consumption alerts.

The total number of AMI units currently operational ~~and a description of how the AMI system is being used~~ must be recorded in the provider's CER. A description of how the AMI system is being used must be made available to ADWR upon request.

3.5 Approved Comprehensive Water System Audit Program

13 points

The provider conducts a systematic water loss or non-revenue water audit following an established methodology and utilizing best loss control techniques, (such as those defined in the American Water Works Association). The audit program may include a review of the provider's water distribution system, systems control equipment, and water records to identify and quantify water losses, and shall develop a plan for corrective measures. The audit can be a precursor to a leak detection or meter repair or replacement program.

The provider must report the water loss or non-revenue water number. If the provider utilized an established criteria, the name of the criteria must be reported in the CER, otherwise report in-house methodology.

~~any of the submit documentation with its CER that describes the audit, its objectives, methods, and results. Credit for this BMP is limited to only one year unless the provider can provide justification for an ongoing or multi-year program. In subsequent years, the provider must replace this BMP with another BMP from categories 1 through 7 that is appropriate for its service area. A summary of the audit must be made available upon request.~~

Category 4: Sustainable Water Governance

BMPs in this category are designed to reduce water use within the provider's service area by implementing ordinances or tariffs. Ordinances apply to cities and towns and tariffs apply to private water companies regulated by the Arizona Corporation Commission (ACC). A provider that is not part of a municipality can receive credit if it works with local or county jurisdictions to implement a new ordinance.

Note: BMPs that are part of curtailment tariffs for private water utilities do not qualify for the NPCCP because they are only implemented as a response to water shortage or potential water shortage, and do not apply at all times.

**Point(s)
Value**

Description

**Implementation and Reporting
Requirements**



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4.1 Low-Water-Use Landscape Requirements

1 point	Single-family, multi-family, non-residential facilities or common areas are either required to include low-water-use landscapes in all or part of their property or have limitations on water-intensive landscaping or turf.	The provider must submit with its CER, <u>the requirement's ordinance number and a link to the digital municipal code where the ordinance can be found. It must be noted if the requirement is new, was updated, or remained unchanged for the reporting year. It must also be noted if the requirement is reviewed for compliance, enforcement, or both. a reference to the specific requirement and a description of enforcement and/or follow-up actions related to the requirement.</u>
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4.2 Water Tampering and/or Water Waste Prohibition

1 point	Water waste or water tampering are prohibited on residential or non-residential properties.	The provider must submit with its CER, <u>the requirement's ordinance number and a link to the digital municipal code where the ordinance can be found. It must be noted if the requirement is new, was updated, or remained unchanged for the reporting year. It must also be noted if the requirement is reviewed for compliance, enforcement, or both. a reference to the specific requirement and a description of enforcement and/or follow-up actions related to the requirement.</u>
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4.3 Plumbing Requirements

1 point	Plumbing requirements for new residential or non-residential properties <u>incorporate water-efficiency standards that meet or exceed those specified by the EPA WaterSense Program. are stricter than those currently in the Arizona code or</u>	The provider must submit with its CER, <u>the requirement's ordinance number and a link to the digital municipal code where the ordinance can be found. It must be noted if the requirement is new, was updated, or remained unchanged for the reporting year. It must also be noted if the requirement is reviewed for compliance, enforcement, or both. a reference to the specific requirement and a description of enforcement</u>
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~~and/or follow-up actions related to the requirement.~~

~~include restrictions not currently in the Arizona e~~

4.4 Water Feature Limitations

1 point

Residential or non-residential properties have limitations on or water conservation requirements for water features (fountains, waterfalls, ponds, and other artificial water structures).

The provider must submit with its CER, the requirement's ordinance number and a link to the digital municipal code where the ordinance can be found. It must be noted if the requirement is new, was updated, or remained unchanged for the reporting year. It must also be noted if the requirement is reviewed for compliance, enforcement, or both. ~~a reference to the specific requirement and a description of enforcement and/or follow-up actions related to the requirement.~~

4.5 Water-Efficient Model Home Landscape Requirements

1 point

Landscaping at model homes in new residential developments is required to be water-efficient, is limited as to the size of water-intensive landscaped areas or requires water-intensive landscaping to be used for functional areas only.

The provider must submit with its CER, the requirement's ordinance number and a link to the digital municipal code where the ordinance can be found. It must be noted if the requirement is new, was updated, or remained unchanged for the reporting year. It must also be noted if the requirement is reviewed for compliance, enforcement, or both. ~~a reference to the specific requirement and a description of enforcement and/or follow-up actions related to the requirement.~~

4.6 Graywater or Rainwater System Requirements

1 point

Residential or non-residential facilities are required to have on-site plumbing or systems for collecting and utilizing graywater or rainwater.

The provider must submit with its CER, the requirement's ordinance number and a link to the digital municipal code where the ordinance can be found. It must be noted if the



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requirement is new, was updated, or remained unchanged for the reporting year. It must also be noted if the requirement is reviewed for compliance, enforcement, or both. a reference to the specific requirement and a description of enforcement and/or follow-up actions related to the requirement.

4.7 Water Intensive Commercial User Requirements

1 point

Water intensive commercial users are required to recycle water where feasible and must implement additional measures to increase water use efficiency and reduce water consumption. Examples of additional measures include using low flow nozzles, repairing leaks, watering landscape with reclaimed water, installing low-water-use landscapes or using automatic shut-off valves on hoses and faucets.

The provider must submit with its CER, the requirement's ordinance number and a link to the digital municipal code where the ordinance can be found. It must be noted if the requirement is new, was updated, or remained unchanged for the reporting year. It must also be noted if the requirement is reviewed for compliance, enforcement, or both. a reference to the specific requirement and a description of enforcement and/or follow-up actions related to the requirement.

4.8 Landscape Watering Restrictions

1 point

The watering of landscapes is restricted to certain times of day, specific days of the week, restricted after a rainfall, or changed depending on seasons, etc. ~~(This may be seasonal.)~~

The provider must submit with its CER, the requirement's ordinance number and a link to the digital municipal code where the ordinance can be found. It must be noted if the requirement is new, was updated, or remained unchanged for the reporting year. It must also be noted if the requirement is reviewed for compliance, enforcement, or both. a reference to the specific requirement and a description of enforcement and/or follow-up actions related to the requirement.



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4.9 Water-Efficient Hot Water Device or System Requirements

1 point

Water-efficient plumbing design, “on-demand” hot water recirculation devices or other devices or designs for providing hot water efficiently are required in new residential and/or non-residential buildings.

The provider must submit with its CER, the requirement’s ordinance number and a link to the digital municipal code where the ordinance can be found. It must be noted if the requirement is new, was updated, or remained unchanged for the reporting year. It must also be noted if the requirement is reviewed for compliance, enforcement, or both.~~a reference to the specific requirement and a description of enforcement and/or follow up actions related to the requirement.~~

4.10 Retrofit on Resale

1 point

Owners of single-family homes, multi-family home complexes or non-residential facilities are required to replace or retrofit all indoor plumbing fixtures (e.g., toilets, showerheads, faucets) that do not conform to current water efficiency standards. This could be implemented by the seller prior to sale or by the buyer subsequent to the sale.

The provider must submit with its CER, the requirement’s ordinance number and a link to the digital municipal code where the ordinance can be found. It must be noted if the requirement is new, was updated, or remained unchanged for the reporting year. It must also be noted if the requirement is reviewed for compliance, enforcement, or both.~~a reference to the specific requirement and a description of enforcement and/or follow up actions related to the requirement.~~

4.11 Non-Residential Landscape Water-Use Efficiency Standards^[SD1]

1 point

New or rehabilitated non-residential facility landscaping of a particular size is required to meet specified standards for maximum water allowance, plant selection, irrigation design, grading or other components that result in improved landscape water use efficiency.

The provider must submit with its CER, the requirement’s ordinance number and a link to the digital municipal code where the ordinance can be found. It must be noted if the requirement is new, was updated, or remained unchanged for the reporting year. It must also be noted if the requirement is reviewed for



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~~compliance, enforcement, or both. a reference to the specific requirement and a description of enforcement and/or follow-up actions related to the requirement.~~

4.13 Conservation Rate Structure

1 point

The water provider implements a rate structure that incentivizes customers to conserve more water and/or use water more efficiently.

The provider must submit with its CER, a ~~reference to the specific requirement and a description of enforcement and/or follow-up actions related to the requirement.~~ copy of the rate structure and must note if the structure is new, was updated, or remained unchanged for the reporting year.

4.14 Enforcement or Audit of Requirements Recommend Removal

1 point

~~The provider has an enforcement or audit program to routinely investigate compliance with the conditions or requirements in place.~~

~~The provider must submit with its CER, a description of the compliance or audit program which includes how many investigations were conducted, the number of violations, and the enforcement and/or follow-up actions for each violation.~~



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Category 5: Residential Conservation Incentives

BMPs in this category are designed to encourage residential water users to reduce water use through no interest or low interest loans, financial rebates, and other incentives.

Point(s) Value	Description	Implementation and Reporting Requirements
5.1 Residential Customer Assistance		
1 point	The water provider offers residential customers in its service area free services or no interest or low-interest loans to repair inefficient equipment or leaks. Repairs include replacing parts, performing maintenance, or installing new fixtures.	The number of customers assisted, type of repair (part replacement, maintenance, or replacement), and actual water savings one year pre- and post-repair per type must be reported in the provider's CER.
5.2 Residential Toilet Incentive		
1 point	The water provider offers residential customers in its service area a financial rebate or other incentive for the purchase and installation of toilets that are at least as efficient as EPA's WaterSense standards.	The number of toilets rebated, the total amount rebated, and actual water savings one year pre- and post-rebate must be reported in the provider's CER.
5.3 Residential Smart Irrigation Technology Incentive		
1 point	The water provider offers residential customers in its service area a financial rebate or other incentive for the purchase and installation of smart irrigation technology (e.g. irrigation controllers, nozzles, flow sensors, etc.). <u>The technology must be at least as efficient as EPA's WaterSense standards or the provider must submit documentation of the technology's benefits.</u>	Documentation of the technology's benefits, <u>(if not WaterSense labeled)</u> , the number and type of technology rebated, the total amount rebated per technology, and actual water savings one year pre- and post-rebate per technology must be reported in the provider's CER.
5.4 Residential Water-Efficient Appliance Incentive		
1 point	The water provider offers residential customers in its service area a financial rebate or other incentive for the purchase and installation of water efficient appliances (e.g. clothes washer, hot water device). <u>The technology must be at least as efficient as EPA's WaterSense standards or the provider must submit documentation of the</u>	The type and number of appliances rebated, the total amount rebated per type of appliance, and actual water savings one year pre- and post-rebate per appliance must be reported in the provider's CER.



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technology's benefits.

5.5 Residential Graywater Incentive

1 point

The water provider offers residential customers in its service area a financial rebate or other incentive for the installation of graywater systems, fixtures, or retrofits along with educational material on the benefits of using graywater.

The type and number of retrofits rebated, total amount rebated, and actual water savings one year pre- and post-rebate must be reported in the provider's CER.

5.6 Residential Rainwater Harvesting Incentive

1 point

The water provider offers residential customers in its service area a financial rebate or other incentive for the installation of active or passive rainwater harvesting systems (e.g. gutters, downspouts, landscape designs, containers, etc.) along with information about water-harvesting techniques.

The type and number of rebates provided, total amount rebated per type, and actual water savings one year pre- and post-rebate must be reported in the provider's CER.

5.7 Residential Landscape Conversion Incentive

12 points

The water provider offers residential customers in its service area a financial rebate or other incentive for the conversion of landscape to reduce water usage. Examples include replacing grass with xeriscape or converting a high-water-use landscape to a low-water-use landscape. Information about landscape conversions must be provided to customers.

The type and number of rebates provided, total amount rebated per type, square feet of grass removed (if applicable), and actual water savings one year pre- and post-rebate per type of rebate must be reported in the provider's CER.

5.8 Residential Xeriscape Installation in New Landscapes Incentive

1 point

The water provider offers residential customers in its service area installing new landscapes in new construction homes a financial rebate or incentive for installing a xeriscape landscape.

The type and number of rebates provided, and total amount rebated per type must be reported in the provider's CER.



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Category 6: Non-Residential Conservation Incentives

BMPs in this category are designed to encourage non-residential water users to reduce water-use through no interest or low interest loans, financial rebates, and other incentives.

Point(s) Value	Description	Implementation and Reporting Requirements
6.1 Non-Residential Customer Assistance <u>Recommended Removal</u>		
1 point	The water provider offers assistance to customers wishing to invest in projects intended to reduce existing water use or bring new uses in at high efficiency rates.	A description of the program and its results must be noted in the provider's CER.
6.2 Commercial and Industrial Customer Incentive		
1 point	The water provider identifies commercial and industrial customers in its service area with <u>the highest</u> conservation potential and implements a water conservation program and/or rebate or incentive program for those customers. The program may include replacements, retrofits, and audits and may focus on outdoor use (irrigation, water features, pools, etc.) or indoor use (machinery, bathrooms, cooling towers, etc.).	A description of the program and actual water savings pre- and post-project must be noted in the provider's CER.
6.3 Non-Residential Toilet and/or Urinal Incentive		
1 point	The water provider offers non-residential customers in its service area a financial rebate or other incentive for the purchase and installation of toilets and/or urinals that are at least as efficient as EPA's WaterSense standards.	The number of toilets and/or urinals rebated, the total amount rebated, and actual water savings one year pre- and post-rebate must be reported in the provider's CER.
6.4 Non-Residential Smart Irrigation Technology Incentive		
1 point	The water provider offers non-residential customers in its service area a financial rebate or other incentive for the purchase and installation of smart irrigation technology (e.g. irrigation controllers, nozzles, flow sensors, etc.). <u>The technology must be at least as efficient as EPA's</u>	Documentation of the technology's benefits <u>(if not WaterSense labeled)</u> , the number and type of technology rebated, the total amount rebated per type of technology, and actual water savings one year pre- and post-rebate per type of technology must be reported in the provider's CER.



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WaterSense standards or the provider must submit documentation of the technology's benefits.

6.5 Non-Residential Water-Efficient Appliance Incentive

1 point	The water provider offers non-residential customers in its service area a financial rebate or other incentive for the purchase and installation of water efficient appliances (e.g. clothes washer). <u>The appliance must be at least as efficient as EPA's WaterSense or Energy Star standards.</u>	The type and number of appliances rebated, the total amount rebated per type of appliance, and actual water savings one year pre- and post-rebate per appliance must be reported in the provider's CER.
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6.6 Non-Residential Graywater Incentive

1 point	The water provider offers non-residential customers in its service area a financial rebate or other incentive for the installation of graywater systems, fixtures, or retrofits along with educational material on the benefits of using graywater.	The type and number of retrofits rebated, total amount rebated, and actual water savings one year pre- and post-rebate must be reported in the provider's CER.
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6.7 Non-Residential Rainwater Harvesting Incentive

1 point	The water provider offers non-residential customers in its service area a financial rebate or other incentive for the installation of active or passive rainwater harvesting systems (e.g. gutters, downspouts, landscape designs, containers, etc.) along with information about water-harvesting techniques.	The type and number of rebates provided, total amount rebated per type, and actual water savings one year pre- and post-rebate per type of rebate must be reported in the provider's CER.
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6.8 Non-Residential Landscape Conversion Incentive



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**12
points**

The water provider offers non-residential customers in its service area a financial rebate or other incentive for the conversion of landscape to reduce water usage. Examples include replacing grass with xeriscape or converting a high-water-use landscape to a low-water-use landscape. Information about landscape conversions must be provided to customers.

The type and number of rebates provided, total amount rebated per type, square feet of grass removed (if applicable), and actual water savings one year pre- and post-rebate per type of rebate must be reported in the provider's CER.

6.9 Non-Residential Xeriscape Installation in New Landscapes Incentive

1 point

The water provider offers nonresidential customers in its service area installing new landscapes in new, non-residential construction a financial rebate or incentive for installing a xeriscape landscape.

The type and number of rebates provided, and total amount rebated per type must be reported in the provider's CER.

~~6.10 Non-Residential Large Landscape Incentive~~ Recommended Removal

~~1 point~~

~~The water provider implements a program to provide non-residential customers with support and incentives to improve their landscape water use efficiency.~~

~~A description of the program and its results must be noted in the provider's CER.~~

Category 7: Planning

BMPs in this category are related to planning and long-term sustainability of water supply.

Please see Attachment D for AMWUA's comments on the proposed "Category 7: Planning"

7.1 Land Use Planning and Water Utility Coordination and Communication



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TBD

The water provider collaborates and communicates with community land use planners within their jurisdiction (service area). Both the local land use planning/platting entity (land use authority) and the water provider each designate a contact person for collaboration. In addition, an elected representative or senior management staff of the land use authority is identified as overseeing the collaboration between the land use planning and water provider functions; alternatively, a subcommittee of the local use authority is assigned responsibility for overseeing the collaboration of the land use planning and water provider functions. The meetings should be used to collaborate on water and land use planning, share data, and develop projects or scenario planning for their shared jurisdiction. This partnership implements a collaborative program designed to increase water use efficiency or reduce water consumption within the water provider's and land use authority's service areas.

The provider must submit with its CER documentation explaining the collaboration between the land use planning staff and water provider staff which could include the type of projects and/or scenario planning that have been developed, the type of data collection and/or sharing that is occurring, and/or other activities that have transpired with this collaboration.

7.2 Staff Education or Training

TBD

Staff from the water provider and/or land use authority attend an education or training program that expands staff knowledge and resources for integrated land use planning and water management. Qualifying educational events include workshops, trainings, or conference sessions for which continuing education credits are offered.

The provider must state in its CER the number of staff from either the provider or its associated land use authority who participated in an educational or training program about integrated land use planning and water management and a description of each educational or training program attended.



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7.3 Non-Residential Water-Use Plan

TBD

All new commercial, industrial, and institutional customers with projected annual water use of 10 acre feet (AF) or more per year are required to submit a water use plan that identifies all anticipated water uses by the customer and the water efficiency measures associated with the uses. The water use plan must include at least five of the following:

1. Statement of water efficiency policy.
2. Water conservation education/training for employees.
3. Identification of on-site recycling and reuse strategies.
4. Total cooling capacity and operating total dissolved solids or conductivity for cooling towers.
5. Identification of best available technologies used for process, cooling, and domestic water uses.
6. Landscape watering system distribution uniformity and landscape water budget.
7. Total annual water budget for the facility.
8. Consideration of land use planning best management practices to promote demand management, water efficiency, and water conservation.

The provider must submit with its CER a copy of their Non-Residential Water-Use Plan. It should be clear which five (or more) elements listed in BMP 7.3 are included in the plan.

7.4 Integrated Long-Range Planning

TBD

Water providers work with local governments to ensure that long-range planning activities take water resource availability and sustainability into account, in at least three of the following ways:

1. Local governments include a water element and cover water considerations in their General Plan in at least 3 of the following ways:

The provider submits with its CER copies of their local plans highlighting how they take long-range planning, water resources, and sustainability into account.



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- a. Requirements of Ariz. Rev. Stat. § 9-461.05(F):
 - (a) The known legally and physically available surface water, groundwater and effluent supplies.
 - (b) The demand for water that will result from future growth projected in the county plan, added to existing uses.
 - (c) An analysis of how the demand for water that will result from future growth projected in the comprehensive plan will be served by the water supplies identified in subdivision (a) of this paragraph or a plan to obtain additional necessary water supplies.
- b. Calculating water use by land use type in zoning maps and proposed zoning changes.
- c. Prioritization of water-efficient land use forms, such as mixed-use development, infill development, compact development, smaller lots, turf restrictions or limits, or increased building density.
- d. Use of zoning tools, such as an overlay zone, to protect areas for groundwater recharge, water quality, or stormwater infiltration.
- e. Policies to encourage water-efficient development, such as development incentives, water budgets, or revised annexation policies sensitive to water



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- availability and service infrastructure.
- f. If a private water company, must review and comment or otherwise participate in the General Plan development and implementation of a water element for local jurisdictions within their service area.
2. Local governments ensure their Capital Improvement Plans are consistent with provider Conservation, Drought, or Adequacy Plans; or any Water Master Plans the municipality may create.
 3. Local governments prioritize water resources sustainability and resiliency in Sustainability Plans, Resilience Plans, or Climate Action Plans.
 4. Local governments provide strategies for securing their water resources within Hazard Mitigation Plans.
 5. Providers create a One Water Plan or Integrated Water Resources Management Plan to holistically consider management of potable water, wastewater, and stormwater.

7.5 Conservation-Oriented Development

TBD

Water providers incentivize developers to design advanced water efficiency and water management considerations into new buildings or subdivisions, in at least one of the following ways:

- LEED Neighborhood Development Standards
- EPA WaterSense Labeled Homes
- Low water use model or demonstration homes

The provider submits with its CER a description of how developers are taking water management considerations into new building design and/or associated incentive programs encouraging developers to do so.



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- Low impact development and green infrastructure design for stormwater management or rainwater harvesting
- Low water use land uses such as mixed-use development, infill development, compact development, cluster development, smaller lots, turf restrictions or limits, or increased building density
- Developer incentives for water conservation and efficiency such as density bonuses or infill incentives
- Water budgets by lot or land use type
- New construction ordinances for water efficiency
- Low water use landscaping requirements or irrigation efficiency requirements

7.6 Water Demand Adaptive Management and Shortage Response

Water providers pursue adaptive demand management approaches that improve their ability to respond to drought, shortage, or other conditions requiring reduction in water demand, in at least one of the following ways:

TBD

- Create a Drought Mitigation Plan that includes thresholds at which different water demand reduction actions, either voluntary or mandatory, would be taken.
- Create a Drought Mitigation Plan that identifies a variety of strategies to reduce water demand by certain percentages if needed.
- Establish separate irrigation system zones for areas where if necessary, water can be cut back (e.g. turf) versus areas where water should be maintained (trees).

The provider submits with its CER a description of their adaptive demand management approach(es) with copies of any relevant documents, such as drought mitigation plans.



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- Establish education and incentive programs for residential yard irrigation.
- Retrofit irrigation systems in city-owned facilities (e.g. parks).

7.7 Water Supply Diversity

Water providers diversify their water supply portfolio to improve supply reliability in the event of shortages or other supply disruptions, with the goal to make the supply portfolio as robust and diverse as possible, in at least one of the following ways:

- TBD**
- Recharge and recovery infrastructure and programs above and beyond assured water supply requirements.
 - Hydraulic modelling to identify potential impacts of increased groundwater pumping on water levels, neighboring wells, water quality and contaminate plumes, etc., and opportunities to mitigate such impacts.
 - Regional collaboration on water infrastructure and interconnection agreements to increase local and regional water supply reliability.

The provider submits with its CER a description of which method(s) listed in BMP 7.7 have been implemented to diversify their water supply portfolio.

7.8 Formalization of Water Efficiency Requirements

Providers work with local governments to codify water efficiency, conservation, or water demand management strategies into local codes and ordinances. This formalization must include at least two of the following:

- TBD**
1. Local government adopts a water-efficient, xeric, or native plant landscape code; or a landscape code that limits turf type and turf area, for single-family, multi-family, non-residential facilities or common areas on all or part of their property.

The provider submits with its CER a description of how water efficiency, conservation, or demand management strategies have been integrated into local codes and ordinances. The provider must indicate which requirements were implemented from the options listed in BMP 7.8.



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2. Local government adopts an irrigation efficiency regulation, such as a fixture efficiency requirement, outdoor watering restrictions, or irrigation system installer certifications.
3. Local government adopts a green building code that includes water efficiency metrics and building or construction standards.
4. Local government codifies and implements a water demand offset or water neutral development program for new development to maintain or reduce total water demand in utility service area or a watershed.
5. Local government conducts a code audit to identify and remove barriers to stated water efficiency goals. For example, misleading policies such as a turf requirement for stormwater retention basins when there are residential turf restrictions in place, or an incentive program for onsite graywater reuse if building and plumbing codes prohibit graywater reuse.
6. Local government includes water considerations and water efficiency incentives into the development approval process, development agreements, and Planned Unit Developments.
7. Residential or non-residential properties have limitations on or water conservation requirements for water features (fountains, waterfalls, ponds and other artificial water structures).



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Category 8: Research, Analysis, and Innovation

BMPs in this category are designed to encourage water providers to conduct systematic evaluations of conservation measures already implemented, research and implement state-of-the-art water conservation technologies and techniques, and/or develop or try new technologies and techniques.

Point(s) Value	Description	Implementation and Reporting Requirements
8.1 Market Surveys and/or Focus Groups		
12 points	The water provider conducts a <u>professional</u> market survey and/or focus group to be used to improve the water provider's current water conservation activities or to plan future activities. The survey and/or focus group is designed to gather data regarding customers' information needs, program preferences, or <u>effectiveness of responses to</u> conservation messages <u>or programs</u> .	The provider must submit documentation with its CER stating the objectives of the survey and/or focus group, data collection methods, analysis of results, and how the results were communicated. Credit for this BMP is limited to once every five years. <u>This document shall be made available for public distribution.</u>
8.2 Research of a New Technology and/or Technique		
12 points	The provider researches, contributes financial support, or provides in-kind services for the research of a new technology or technique that will enhance their conservation program decision making and development, improve water efficiency or result in water savings.	The provider must submit with its CER documentation that describes the research objectives, methods, and results. Additionally, the provider must provide its involvement and methods of support and any other participatory party's involvement and methods of support. This documentation shall be made available for public distribution.
8.3 Pilot Plan Development for a New Technology and/or Technique		



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21 points

The provider plans, contributes financial support, or provides in-kind services for the plan development for a pilot of a new technology or technique that will enhance their conservation program decision making and development, improve water efficiency, or result in water savings.

The provider must submit with its CER documentation that details the pilot plan, including but not limited to the timeline for implementation, the projected cost of the project, the customers selected (residential, non-residential, the water provider, etc.), the desired outcomes, the proposed methods of analysis, and any anticipated challenges. Additionally, the provider must provide its involvement and methods of support and any other participatory party's involvement and methods of support. This documentation shall be made available for public distribution.

8.4 Piloting a New Technology and/or Technique

21 points

The provider pilots, contributes financial support, or provides in-kind services for piloting a new technology or technique that will enhance their conservation program decision making and development, improve water efficiency, or result in water savings.

The provider must submit documentation with its CER that includes the pilot program tracking information, including but not limited to the actual timeline of implementation, the actual cost of the pilot, the actual customers selected, the actual method of analysis, and any challenges that occurred and how they were mitigated. Additionally, the provider must provide its involvement and methods of support and any other participatory party's involvement and methods of support. This documentation shall be made available for public distribution.

8.5 Evaluation of a New or Emerging Technology and/or Technique



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12 points

The provider conducts, contributes financial support, or provides in-kind services for conducting an evaluation of a new technology and/or technique that will enhance their conservation program decision making and development, improve water efficiency, or result in water savings.

The provider must submit documentation with its CER that details the evaluation, including but not limited to the methods used to conduct the evaluation, the results of the evaluation, final conclusions of the evaluation, and any missing information that may be useful in future analysis. Additionally, the provider must provide its involvement and methods of support and any other participatory party's involvement and methods of support. This documentation shall be made available for public distribution.

8.6 Third Party Evaluation of an Existing Analyzing a Best Management Practice (BMP) or New or Emerging Technology or Practice for Actual Water Savings

12 points

The provider engages a subject-matter expert either through volunteering, financial support, or in-kind services to evaluate an existing BMP or new or emerging technology or practice. The evaluation should state the effectiveness of the BMP or new or emerging technology or practice based on ~~conducts a quantitative analysis of a BMP that yields results regarding~~ actual water savings.

The provider must submit documentation with its CER that shows the methodology of the third-party analysis, the actual water savings, and how the provider intends to use the evaluation to implement, modify, or enhance the BMP or new or emerging technology or practice. stating the objectives, methods used to conduct the analysis, and the results of the investigation. This documentation shall be made available for public distribution. ~~Credit for this BMP is limited to only one year unless the provider can offer justification for an ongoing or multi-year program. In subsequent years, the provider must analyze a different BMP to receive credit.~~

III. Procedure for Adding a Best Management Practice to the List of Additional Best Management Practices



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1. A large municipal provider may apply to the Director to add a Best Management Practice to the list of additional Best Management Practices set forth in Section II of this Appendix.
2. Upon receipt of an application submitted pursuant to paragraph 1 above, the Director shall review the application and may request additional information from the applicant. The Director may seek information from other sources as deemed necessary to determine if the Best Management Practice should be added to the list.
3. If the Director approves the application, the Director shall add the Best Management Practice to the list of additional Best Management Practices set forth in Section II of this Appendix, post the modified list of additional Best Management Practices on ADWR's web site and file the modified list within ADWR's active management area office.
4. The Director may add a Best Management Practice to the list of additional Best Management Practices set forth in Section II of this Appendix

5th Management Plan Non-Per Capita Conservation Program: *Planning Category Comments*

AMWUA has reviewed the proposed “Planning Category” which was drafted by the Babbitt Center for Land and Water Policy and offers the following comments and recommendations for ADWR’s consideration.

Overall, the BMPs located within the proposed “Planning Category” capture a substantial number of forward thinking, sound water management practices. AMWUA is fully in support of continuing to break down siloes in the water industry and enhance the linkage between water resource and land use planning.

AMWUA suggests that ADWR, the Babbitt Center, and any other interested stakeholders continue to work towards refinement of the proposal. In particular, there are a substantial number of BMP criteria in the proposed “Planning Category” that overlap with existing regulatory requirements and water management practices. Including these BMPs in the 5MP as written would give credit under the NPCCP without resulting in increased water conservation or efficiency gains. Additionally, there are a number of instances throughout the proposal where it is unclear how a private water company without jurisdiction of land use development and planning would be able to implement many of the BMP criteria listed.

We believe that the suggestions included in the “Planning Category” have the potential to make a positive impact on AMA water management, and look forward to more discussions on how the proposal can be enhanced to align with the NPCCP’s regulatory objectives and ensure it focuses on our collective goal of increased water conservation and efficiency.

7.1 Land Use Planning and Water Utility Coordination and Communication

This BMP utilizes “community land use planners,” “land use authority,” and “land use planning/platting entity” interchangeably. Does this include consultants and non-profits? Would coordination between a municipality’s planning department and water services department satisfy this BMP’s criteria? AMWUA suggests refining for more clarity on the type of collaboration between which parties, and potentially defining the qualifying entities more explicitly here or elsewhere in the SMP.

7.2 Staff Education or Training

As currently written, a water provider would receive credit for this BMP if a staff member from a “land use authority” were to attend a training. This should be clarified to ensure that the BMP is applicable to the actions of a municipal water provider. It is unclear if the intent is to provide trainings for water utility staff, land use authority staff, or both. This BMP largely overlaps *BMP 7.1*, and would appear if a water provider partners with a land use authority to set up staff training, the provider would receive credit for both BMPs.

7.3 Non-residential Water Use Plan

Non-residential water users regulated as *Individual Users* under the Management Plans are required to implement a number of conservation and reporting requirements. This BMP should be evaluated against the existing regulatory requirements for Individual Users, as well as *BMP 4.7 Water Intensive Commercial User Requirements* to reduce overlap.

7.4 Integrated Long-Range Planning

AMWUA supports the concept of linking land-use planning activities with water resource and demand management. There are a number of actions in *BMP 7.4* that would move this linkage in a positive direction. It is AMWUA’s understanding that local governments and water providers in the Phoenix AMA commonly incorporate water supply planning and sustainability considerations in their various planning documents, including General Plans, Sustainability Plans, and Water/Wastewater Master plans.

AMWUA suggests that this BMP is positive in supporting these important planning efforts, but that it be refined to give more specific criteria that encourage actions beyond what is broadly implemented today. In addition to this general recommendation, a number of subsection-specific comments are offered below:

Subsection 1

This subsection appears to only be applicable to water providers who are also local governments. Item 1(a) needs clarification: is the intent to require the provisions of § 9-461.05(D)(5) which are already statutorily mandated for cities with populations greater than 10,000?

Item 1(f) conflicts with the subsection's applicability to "local governments." As currently written, even if a private water company were to participate in General Plan development as stated in 1(f), it still would not be able to engage in items 1(a) through 1(e) to satisfy the minimum of three criteria.

Subsection 2

Water providers are already typically required to submit a Capital Improvement Plan that demonstrates adequate delivery, storage, and treatment works are available for water service in order to satisfy the Financial Capability requirement for an Assured Water Supply application. In addition, it is unclear why a local government would have a Capital Improvement Plan that is inconsistent with its own water-related plans.

Subsection 4

How does this Subsection apply to jurisdictions that participate in the Maricopa County regional Hazard Mitigation Plan, which already contemplates drought and water shortage?

7.5 Conservation-Oriented Development

There is substantial overlap with *BMP 7.5* and the existing BMPs located within Category 4: Sustainable Water Governance. This BMP should be reviewed to avoid double-counting.

7.6 Water Demand Adaptive Management and Shortage Response

A.R.S. § 45-341 *et seq.* requires large municipal water providers to submit a "Drought Preparedness Plan" to ADWR every five years. The criteria listed in *BMP 7.6* are substantively duplicative of the statutory requirements for a Drought Preparedness Plan. Criteria #4 and #5 are also similar to other existing BMPs within the NPCCP aimed at incentivizing education and retrofits.

The criteria listed within *BMP 7.6* should be reviewed before giving credit for water management activities that are already regulatory requirements. There may be potential to incentivize practices such as a “Water Supply Plan” and/or “Water Conservation Plan” that are optional for large/designated water providers. Please see the suggestions for *BMP 7.4*.

7.7 Water Supply Diversity

AMWUA supports the water management perspective embodied in *BMP 7.7* to “make the supply portfolio as robust and diverse as possible,” however ADWR should consider how this BMP and its objective aligns with the purpose of the NPCCP which is to reduce water use.

Additionally, more refinement and clarification are needed on the BMP criteria. For option #1, what type of recharge and recovery programs would constitute above and beyond Assured Water Supply (AWS) requirements? Option #2 should take into consideration that hydrologic modeling for Aquifer Protection Permits, Recharge, Recovery, well siting, and AWS physical availability demonstrations may satisfy the criteria as currently written.

7.8 Formalization of Water Efficiency Requirements

The requirements in this BMP appear to only be applicable to local governments who also provide water service to their community. How would a private water company demonstrate that it has worked with a local government to adopt any of these ordinances/requirements? This BMP should be reviewed for overlap with the proposed *BMP 7.4*, and Option #7 should be removed as it is duplicative of the existing *BMP 4.4*.